

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**GUSTAVO CARDENAS, JUSTINO NARANJO VARGAS,
SALVATORE NARANJO VARGAS, RUBIN NAVA,
Individually and on behalf of other persons similarly
Situating who were employed by AAA CARTING
And RUBBISH REMOVAL CORP., and/or
PASQUALE CARTALEMI and PASQUALE
CARTALEMI, JR., ANGELO CARTALEMI, or any
Other entities affiliated with or controlled by
AAA CARTING And RUBBISH REMOVAL CORP.
And PASQUALE CARTALEMI,**

Plaintiffs,

-v-

**AAA CARTING and RUBBISH REMOVAL
CORP. and PASQUALE CARTALEMI and/or
PASQUALE CARTALEMI and PASQUALE
CARTALEMI, JR. and ANGELO CARTALEMI or any
Other entities affiliated with or controlled by
AAA CARTING And RUBBISH REMOVAL CORP.
And PASQUALE CARTALEMI, PASQUALE
CARTALEMI, JR., And ANGELO CARTALEMI,
and JOHN DOE BONDING COMPANIES 1-20,
and John and Jane Does,**

Defendants.

Case No.: 12-CV-7178(VB)

**NOTICE OF MOTION FOR
FINAL APPROVAL OF
THE CLASS ACTION
SETTLEMENT AND
REQUEST FOR
PROFESSIONAL COSTS
AND FEES**

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Please take notice that, upon the annexed Declaration of Robert F. Milman, sworn to on July 17, 2015, and all exhibits attached thereto, and the Memorandum of Law submitted hereto, and upon all prior pleadings and proceedings herein, the undersigned shall move on July 30, 2015 at a Fairness Hearing before the Honorable Vincent L. Briccetti, at the United States Courthouse for the Southern District of New York, located at 300 Quarropas Street, White Plains, New York, 10601, for: a) Final Approval of the Settlement of this Action; b) an award of attorneys' fees in the amount of \$75,000.00, for legal services performed in successfully prosecuting the claims in this action; c) an award of \$10,000 for costs for out-of-pocket expenses to Class Counsel; and d) approval of incentive awards of \$1,000.00 to each of the named Plaintiffs, and of incentive awards of \$500.00 to each of the

FLSA Class Action Members, along with such other and further relief as the Court deems proper.

Dated: July 17, 2015

Lake Success, New York

Respectfully submitted,

By: /s/

Robert F. Milman, Esq.

Netanel Newberger, Esq.

MILMAN LABUDA LAW GROUP PLLC

Attorneys for Plaintiffs

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